

# **EXHIBIT 48**

**In The Matter Of:**

*In Re: SEPTEMBER 11 LITIGATION,*

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**YOSMARIS (SANTA) GUERRERO**

*October 18, 2007*

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***CONFIDENTIAL***

***TC REPORTING in affiliation with Merrill Corp.***

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**GUERRERO, YOSMARIS (SANTA) - Vol. I**

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11:12:46 2 A. Chris Fernandez? Mm-mmm, I don't  
11:12:50 3 remember.

11:12:50 4 Q. And do you remember any of your employees  
11:12:52 5 ever being -- at Huntleigh, screeners being reprimanded  
11:12:56 6 for fighting, verbally fighting while on duty?

11:13:02 7 A. No.

11:13:06 8 Q. During the time that you were a supervisor  
11:13:08 9 at Huntleigh --

11:13:09 10 A. Yes.

11:13:09 11 Q. -- prior to 9/11, did you ever have to  
11:13:12 12 reprimand any of the screeners?

11:13:15 13 A. Ever what?

11:13:16 14 Q. Ever reprimand? Discipline them?

11:13:18 15 A. No.

11:13:26 16 Q. During your classroom training at  
11:13:28 17 Huntleigh, were you ever instructed on how to detect  
11:13:32 18 mace?

11:13:38 19 A. In my classroom what?

11:13:40 20 Q. Were you ever instructed, were you ever  
11:13:41 21 taught how to detect mace?

11:13:47 22 A. Mace?

11:13:48 23 Q. Mace. Do you know what mace is?

11:13:49 24 Remember, the spray?

11:13:50 25 A. Oh. Repeat that question again.

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11:13:56 2 Q. Sure. Did they ever teach you at  
11:13:58 3 Huntleigh how to detect it?

11:14:01 4 A. Oh, yes.

11:14:02 5 Q. How -- what did they teach you?

11:14:03 6 A. By the machine, and they teach us how we  
11:14:08 7 had to check every bag that has sprays to see if that  
11:14:12 8 is going to be mace.

11:14:14 9 Q. Was this taught in the classroom, on the  
11:14:17 10 job, or both?

11:14:18 11 A. On the classroom.

11:14:20 12 Q. Was it done -- how was the instruction  
11:14:25 13 done? By video? Actually bringing a bag in?

11:14:28 14 A. They bring in a bag, but they show how to  
11:14:30 15 look at the screen.

11:14:31 16 Q. How to look for mace?

11:14:32 17 A. Yes.

11:14:33 18 Q. Well, how to look for what you think is  
11:14:34 19 a -- a spray?

11:14:37 20 A. That looks like sprays.

11:14:39 21 Q. Did they give you any instruction on how  
11:14:42 22 to detect box cutters?

11:14:47 23 A. Box?

11:14:48 24 Q. Oh, that's right. Let me show you what we  
11:14:54 25 previously marked for identification as Exhibit 19.

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11:15:01 2 MR. ROSS: Do you want the blade open?  
11:15:03 3 MR. GRANITO: Yes. You know what? There  
11:15:04 4 you go.  
11:15:05 5 MR. ROSS: Do you want me to open it for  
11:15:07 6 her?  
11:15:08 7 THE WITNESS: I know what it is.  
11:15:08 8 BY MR. GRANITO:  
11:15:09 9 Q. Now, you know what that is?  
11:15:10 10 A. Yes.  
11:15:11 11 MR. GRANITO: Why don't you give it to  
11:15:12 12 her?  
11:15:12 13 MR. ROSS: Watch out. The blade is open.  
11:15:12 14 BY MR. GRANITO:  
11:15:12 15 Q. Why don't you hold that up for the camera,  
11:15:13 16 Ms. -- hold that up, Ms. Guerrero.  
11:15:16 17 A. Oh.  
11:15:16 18 Q. What is that?  
11:15:18 19 A. I call this knife.  
11:15:20 20 Q. You call it a knife?  
11:15:21 21 A. Yes.  
11:15:21 22 Q. Okay. And you never really heard it  
11:15:24 23 referred to as a box cutter?  
11:15:25 24 A. Box cutter, no.  
11:15:25 25 Q. Were you ever trained specifically how to

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11:15:28 2 find that type of item by Huntleigh?

11:15:31 3 A. That's metal, and --

11:15:38 4 Q. Metal?

11:15:38 5 A. Yes. We had to open all bags.

11:15:41 6 Q. But, did you ever -- as part of your

11:15:42 7 training, did they ever say to you, today we're going

11:15:46 8 to learn how to find box cutters?

11:15:53 9 A. Yes. They -- they do that.

11:15:54 10 Q. They did.

11:15:55 11 A. But, they don't take one day to do it,

11:15:59 12 it's teach just one thing. They was teaching all the

11:16:03 13 metal things. The day that they teach the metal

11:16:09 14 machine --

11:16:09 15 Q. Okay.

11:16:10 16 A. -- that's the same day that I --

11:16:12 17 Q. But, you remember being taught how to find

11:16:14 18 that?

11:16:14 19 A. Yes.

11:16:15 20 Q. Exhibit 19?

11:16:16 21 A. Yes.

11:16:16 22 Q. Okay. Did you -- during your time as a

11:16:25 23 screener, at either Globe or Huntleigh, did you ever

11:16:31 24 find that type of an item?

11:16:34 25 A. Yes.

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